

STATEMENT OF BASIS (AI No. 18193)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0085766 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Turn Services, Inc.
2200 Royal Street
New Orleans, LA 70117

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: May 1, 2007

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: September 1, 2002
LPDES permit expiration date: August 31, 2007

C. Date Application Received: February 28, 2007

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - barge cleaning facility**

Turn Services, Inc. is an existing barge cleaning facility. Barges are dry cleaned at area facilities before arrival at the washing site. Barges are swept and washed with river water by means of pumps. After washing, water which remains in cargo holds is removed by pumps and discharged back into the river at the point of intake.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4499

C. LOCATION - River Mile 56 M.A.H.P. on the East Bank at Harlem, Plaquemines Parish Latitude 29°37'33", Longitude 89°54'22"

Statement of Basis for
Turn Services, Inc.
LA0085766, AI No. 18193
Page 2

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: coal and coke barge washwater
Treatment: none
Location: at the point of discharge from the barge being washed
Flow: intermittent
Discharge Route: Mississippi River

Outfall 002

Discharge Type: dry commodity barge washwater
Treatment: none
Location: at the point of discharge from the barge being washed
Flow: intermittent
Discharge Route: Mississippi River

Outfall 03A

Discharge Type: incoming ballast and void water from customer barges
Treatment: none
Location: at the point of discharge from the customer barge tank
Flow: intermittent
Discharge Route: Mississippi River

Outfall 03B

Discharge Type: maintenance ballast and void water
Treatment: none
Location: at the point of discharge from the work barge tank
Flow: intermittent
Discharge Route: Mississippi River

Outfall 004

Discharge Type: treated sanitary wastewater
Treatment: marine sanitation device
Location: at the point of discharge from the sanitary treatment system
Flow: 170 gpd
Discharge Route: Mississippi River

4. RECEIVING WATERS

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi Basin, Segment 070301

Statement of Basis for
Turn Services, Inc.
LA0085766, AI No. 18193
Page 3

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Summary of Proposed Changes From the Current LPDES Permit: Addition of
Outfall 004 - treated sanitary wastewater.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

No records of recent compliance actions were found.

B. DMR Review/Excursions - DMR's were reviewed from January 2004 through
December 2006. No excursions were reported.

7. EXISTING EFFLUENT LIMITS

Outfall 001		Outfall 002
COD	250:400 mg/l	Part II BPJ requirements
TSS	Report:Report mg/l	
pH	6-9	
Outfall 003		
COD	---:250 mg/l	
Oil & Grease	---:15 mg/l	
pH	6-9	

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon and migratory waterfowl, which are listed as endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated 9/29/06 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

Statement of Basis for
Turn Services, Inc.
LA0085766, AI No. 18193
Page 4

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

12. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water shall not be required to obtain and LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.A-k, facilities classified as SIC code 4491 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Part II, Paragraph T of the Draft Permit).

Statement of Basis for
Turn Services, Inc.
LA0085766, AI No. 18193
Page 5

Rationale for Turn Services, Inc.

1. Outfall 001 coal and coke barge washwater

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow MGD	Report:Report	LAC 33:IX.2701.I.1.b
COD	250:400	Similar Discharges; BPJ
TSS	Report:Report	Similar Discharges; BPJ
pH	6.0 - 9.0 s.u.	Similar Discharges; BPJ

Treatment: none

Monitoring Frequency: TSS shall be observed once per month and Flow, COD and pH shall be observed once per week at the point of discharge from the barge being washed.

Limits Justification: Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities.

2. Outfall 002 dry commodity barge washwater

Based on BPJ and on permits for similar facilities, no effluent limitations are established for washwaters from barges previously containing dry commodities including: grain, grain by-product, gypsum, aggregate (limestone, rock, etc.), cement, iron ore, ilmenite, hematite, and urea. Best Management Practices (BMPs) for barge operations are listed in Part II.

3. Outfall 03A incoming ballast and void water from customer barges Outfall 03B maintenance ballast and void water

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow MGD	Report:Report	LAC 33:IX.2701.I.1.b
COD	---:250	Similar Discharges; BPJ
Oil and Grease	---:15	Similar Discharges; BPJ
pH	6.0 - 9.0 s.u.	Similar Discharges; BPJ

Treatment: none

Monitoring Frequency: Flow, COD, Oil & Grease and pH shall be observed once per week at the point of discharge from the incoming customer barge/vessel.

*The measurement frequency for Outfall 03B for the discharge of maintenance ballast and void water shall be 1/month whenever sampling is required.

Statement of Basis for
 Turn Services, Inc.
 LA0085766, AI No. 18193
 Page 6

Limits Justification: Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities.

4. **Outfall 004** treated sanitary wastewater (estimated flow is 170 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Weekly Avg. (mg/l)	<u>Reference</u>
Flow	Report:Report	See limits justification (2) below
BOD ₅	--:45	See limits justification (1),(2) below
TSS	--:45	See limits justification (1),(2) below
Fecal Coliform	---:400	See limits justification (1),(2) below
pH (s.u.)	6.0:9.0 (min:max)	See limits justification (2) below

Treatment: marine sanitation device

Monitoring Frequency: All parameters shall be monitored once per six (6) months in accordance with the current permitting practices for similar outfalls.

Limits Justification:

- 1) Sanitary wastewater regulated in accordance with LAC 33:IX.711 or LAC 33:IX.709.B - Concentration limits are **used** in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD₅ and TSS in terms of concentration. Fecal Coliform limits have been set as per LAC 33:IX.1113.C.5.
- 2) BPJ utilizing the LPDES Class I Sanitary General Permit

BPJ Best Professional Judgement
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is **variable** and estimated.

TMDL Waterbodies

The discharges from Turn Services, Inc. are to the Mississippi River, Subsegment 070301 of the Mississippi River Basin. Subsegment 070301 is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.